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The Draft Strategic Plan calls for making the entire system mandatory by January 2009. Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.

- Yes, a mandatory system is necessary in order to positively track animal movement within the 48 hour window. A voluntary system will not account for all animal movement required to achieve success and will not support 48 hour trace back.

In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.

- Market Managers, Fair Managers, etc. should be responsible for ensuring animals are in compliance as the animals are unloaded. This compliance should be reported to the appropriate database.

In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have the facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites, which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, *i.e.*, can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms? Please give the reasons for your response.

- Tagging sites should be an option for producers who do not have adequate facilities. Providing adequate facilities at producer locations where they do not presently exist will be cost prohibitive to producers.

The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?

- The seller should be responsible for complying with ID and reporting the movement of the animals. This info can be input "Online" by the seller or by a registered agent.

USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? Please give the reasons for your response.

- IDing at anytime, including immediately before entering commerce or commingling would be acceptable. This would allow producers without adequate tagging facilities to ship animals to a sale barn, feed lot, etc. and have the receiving facility tag the animals at unloading. The receiving facility would then be responsible for reporting the tagging and movement information.

Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (*i.e.*, allow too little time), or not aggressive enough (*i.e.*, do not ensure that the NAIS will be implemented in a timely manner)? Please give the reasons for your response.

- Timelines appear to be very adequate for achieving premise ID completion and producer education and development.

Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed? Please give the reasons for your response.

- All species should be implemented using the same timeline. Using staggered implementation will prolong the complete implementation and add to the cost, both government and industry wise, of implementation.

What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd management computer system, mail, phone, third-party submission of data)? Does the type of entity (*e.g.*, producer, market, slaughterhouse), the size of the entity, or other factors make some methods for information submission more or less practical, costly, or efficient? Please provide supporting information if possible.

- Using the Internet to submit info would be most cost effective. In-putters would not need specialized software or special connections to databases. Third party submission could be used for locations not having Internet access. The larger the facility the more expensive and time consuming it would be to use a method other than Internet access. Using Internet submission would also contribute greatly to timely information in-putting. Transferring information via fax or other method to an authorized in-put location would cause undue delays.
- Locations having software applications that would allow “file transfer” to the NAIS database should be allowed to utilize them.
- Locations without Internet access must be provided the options of USPS mail or phone reporting access.

We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

- Numbers of animals shipped, time periods of shipments, locations where animals were shipped. No information should be released unless it is in direct support of a disease trace-back and then it should only be released to USDA/APHIS authorized personnel.

The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?

- Since the seller is responsible for IDing prior to shipment or otherwise entering commerce, the seller should be responsible for reporting any other required information.

A key issue in the development of the animal tracking information. Animal health officials must have immediate, reliable, and uninterrupted access to essential NAIS information for routine surveillance activities and in the event of a disease outbreak. APHIS determined that this goal could best be achieved by having the data repositories managed by APHIS. The Draft Program Standards document provides for two main NAIS information repositories:

The National Premises Information Repository and the National Animal Records Repository. The National Premises Information Repository would maintain data on each production and animal holding location (contact name, address, phone number, type of operation, etc.). The National Animal Records Repository would maintain animal identification and movement data. Recently, however, an industry-led initiative suggested a privately managed database as an alternative for the management of data on animal tracking in the NAIS. The industry group stated that a private database would ensure that the needs of both government and industry would be fulfilled, and that the flow of information throughout the NAIS would be maintained in a secure and confidential manner.

- Privately managed databases that meet all NAIS requirements should be allowed to collect, maintain and report required data.
 - Privately managed databases should be funded by the private organization.
 - NAIS should allow for multiple, privately managed databases as long as they meet NAIS requirements. Private databases should not be required to share resources across industry lines, therefore the databases should not be required to include all species. This requirement would be quite costly to implement and maintain.
 - A public system should be the primary system of choice since all industries or producer organizations would not have private databases. Where both exist, the producer should be given the choice as to which database to use.
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- NAIS should allow for “BIS” as a separate and distinct identification for Bison as opposed to the present ID of “BOV” which should be used exclusively for cattle. Bison are biologically different than cattle and are not as susceptible to some diseases as cattle. For instance, there has never been a documented case of Foot and Mouth Disease or BSE in Bison. Should an outbreak occur in cattle, Bison should not automatically be subjected to the same testing, quarantine, etc. ordered for the cattle industry.
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- USDA/NAIS should provide for adequate funding for implementation and compliance down to the producer level. This will encourage faster and more comprehensive NAIS compliance.